

U.S. DISTRICT COURT
N.D. OF N.Y.
FILED

AT THE UNITED STATES DISTRICT COURT, DISTRICT OF NEW YORK
SEP 10 2015

ALBANY COUNTY, STATE OF NEW YORK
LAWRENCE K. BAERMAN, CLERK
ALBANY

Edward J. Reinhart

Claimant

Civil No.

1:15-cv-1095
(DNH/CFH)

CITIMORTGAGE, INC., Cynthia Rosicki,
Tom P Rosicki, Deborah M Gallo, Virginia
Grapenster, Laura Strauss, Anthony P. Luckie,
William Knox, Rosicki, Rosicki & Associates,
P.C., Ashley S Miller, Akerman LLP,
Mortgage Electronic Registration Systems,
Inc.;

Respondents

claim: trespass, denial of due process, use of
forged instruments to defraud by false claim,
breach of fiduciary duty

Date: September 9, 2015

Parties

Claimant: i, a man, Edward J. Reinhart, by my will, move this claim through this federal court by way of the common law of the land and rights secured and protected to a man by the bill of rights and the constitution for the united states of America, articles one, seven, nine, and ten.

Respondents: CITIMORTGAGE, INC., Cynthia Rosicki, Tom P Rosicki, Deborah M Gallo, Virginia Grapenster, Laura Strauss, Anthony P. Luckie, Rosicki, Rosicki & Associates, P.C., Ashley S Miller, Akerman LLP, Mortgage Electronic Registration Systems, Inc.; acting as FEDERAL AND STATE, agencies, fiduciaries, and agents.

Jurisdiction

1. The parties are diverse.
2. There exists a controversy between the parties.

3. The value of the controversy exceeds 20 dollars.
4. The power of a court can secure the restoration of rights to man.
5. i can move a court and order monetary compensation for damages.

Venue

The court house is within close proximity to the defendants.

Rules of Court

1. i require a court of record.
2. i require man to testify under oath or affirmation to verify claim.
3. i require trial by jury.

Claim

Respondents jointly or severally do trespass on property rights by moving a false claim in name of non-principal by denial of due process, use of forged instruments to defraud by false claim, and breach of fiduciary duty.

Evidence

See exhibit A - Affidavit of Fact

See exhibit B - Notice of filing on court record

I will affirm and verify in open court that all this herein above be true.

By: Edward J. Reinhart

Edward J Reinhart, All Rights
Reserved

AT THE UNITED STATES DISTRICT COURT, DISTRICT OF NEW YORK

ALBANY COUNTY, STATE OF NEW YORK

Edward J. Reinhart

Claimant

Civil No. 1:15-cv-1095
(DNH/CFH)

CITIMORTGAGE, INC., Cynthia Rosicki,
Tom P Rosicki, Deborah M Gallo, Virginia
Grapenster, Laura Strauss, Rosicki, Anthony P.
Luckie, Rosicki & Associates, P.C., Ashley S
Miller, Akerman LLP, Mortgage Electronic
Registration Systems, Inc.;

Respondents

ORDER

Date: _____

The Order

CITIMORTGAGE, INC., Cynthia Rosicki, Tom P Rosicki, Deborah M Gallo, Virginia Grapenster, Laura Strauss, Rosicki, Anthony P. Luckie, Rosicki & Associates, P.C., Ashley S Miller, Akerman LLP, Mortgage Electronic Registration Systems, Inc., is hereby ordered to:

1. cease and desist from sale or threat of sale and dispossession of property at 698 County Route 353, Rensselaerville, NY 12147 or

X ALL that certain plot, piece or parcel of land, situate, lying and being in the Town of Rensselaerville, County of Albany, and State of New York, bounded and described as Lot 6 on the Subdivision & Map of the Lands of Edward Ralshart, as prepared by Sinto Associates, Civil Engineers and Land Surveyors, dated June 26, 1991, last revised September 7, 1992, and filed with the Albany County Clerk on October 6, 1992, in Docket no. 172 as Map No. 9453.

Said Lot 6 is more particularly described as:

BEGINNING at a point in the northerly bounds of County Route 353 (also known as the Livingstonville Road), said point being the southeast corner of the parcel herein described and the southwest corner of Lands now of formerly of Joseph Tinelli; and

RUNNING THENCE from said point of beginning and along the northerly bounds of said road the following three courses:

North 74 degrees 04 minutes 09 seconds West 224.20 feet;

North 73 degrees 19 minutes 40 seconds West 182.99 feet;

North 70 degrees 10 minutes 17 seconds West 55.12 feet to an iron pin set in the southeast corner of Lot #5 as it appears on the above referenced map;

RUNNING THENCE along the easterly bounds of Lot # 5;

North 06 degrees 39 minutes 27 seconds East 447.83 to a point and the southerly bounds of Lot # 4 as it appears on the above referenced map;

RUNNING THENCE along the southerly bounds of Lot # 4;

South 82 degrees 48 minutes 50 seconds East 455.16 to a point in a stone wall and the westerly bounds of lands of the aforementioned Tinelli;

RUNNING THENCE along the westerly bounds of Tinelli and generally along the remnants of a stone wall and extension thereof;

South 06 degrees 39 minutes 27 seconds West 524.14 to the point and place of **BEGINNING**. X

Containing 5.100 acres of land, being the same more or less.

2. restrain from further proceedings on the issue of foreclosure and sale for which there is a challenge to the standing of Respondents to prosecute said foreclosure.
3. restore all of claimant's property

4. compensate claimant for costs to date of \$25,000.

Therefore, the court so orders.

Signed _____

Dated _____, 2015, at _____ a.m./p.m.

AFFIDAVIT OF SERVICE

I Edward Reinhart hereby verify that I caused a true and correct copy of;

- Claim of Trespass
- To be Served by a Process Server, to the below listed address, on or about September 9, 2015 to the following:

Rosicki, Rosicki & Associates, P.C.
Main Office 51 E Bethpage Road
Plainview, NY 11803

By: Edward J. Reinhart

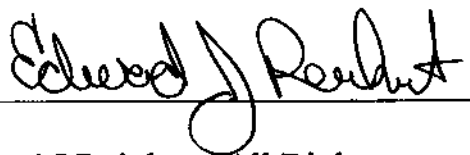
Edward J Reinhart, All Rights
Reserved

AFFIDAVIT OF SERVICE

I Edward Reinhart hereby verify that I caused a true and correct copy of;

- Claim of Trespass
- To be Served by a Process Server, to the below listed address, on or about September 9, 2015 to the following:

Anthony P. Luckie
c/o Rosicki, Rosicki & Associates, P.C.
Main Office 51 E Bethpage Road
Plainview, NY 11803

By: 

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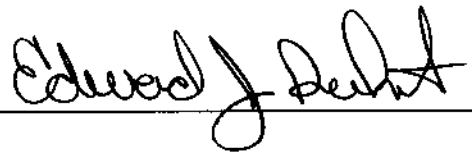
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- To be Served by a Process Server, to the below listed address, on or about September 9, 2015 to the following:

Tom P. Rosicki
c/o Rosicki, Rosicki & Associates, P.C.
Main Office 51 E Bethpage Road
Plainview, NY 11803

By: _____



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- Claim of Trespass
- To be Served by a Process Server, to the below listed address, on or about September 9, 2015 to the following:

Cynthia Rosicki
c/o Rosicki, Rosicki & Associates, P.C.
Main Office 51 E Bethpage Road
Plainview, NY 11803

By: Edward J Reinhart

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- Claim of Trespass
- To be Served by a Process Server, to the below listed address, on or about September 9, 2015 to the following:

William Knox
c/o Rosicki, Rosicki & Associates, P.C.
Main Office 51 E Bethpage Road
Plainview, NY 11803

By: Edward J Reinhart

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- Claim of Trespass
- To be Served by a Process Server, to the below listed address, on or about September 9, 2015 to the following:

Ashley S Miller
c/o Akerman LLP
666 Fifth Avenue
20th Floor
New York, New York 10103

By: Edward J Reinhart

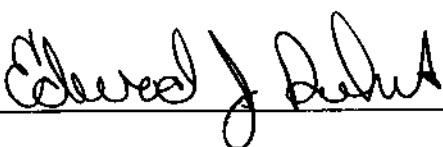
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- Claim of Trespass
- To be Served by a Process Server, to the below listed address, on or about September 9, 2015 to the following:

Akerman LLP
666 Fifth Avenue
20th Floor
New York, New York 10103

By: 

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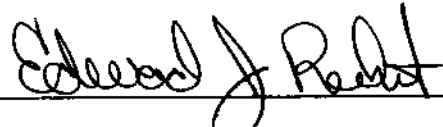
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- Claim of Trespass
- To be Served by a Process Server, to the below listed address, on or about September 9, 2015 to the following:

CITIMORTGAGE, INC.
100 Technology Drive
O'Fallon, Missouri 63368

By: _____

A handwritten signature in black ink, appearing to read "Edward J. Reinhart", is written over a horizontal line.

Edward J Reinhart, All Rights
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- Claim of Trespass
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Deborah M Gallo
c/o Rosicki, Rosicki & Associates, P.C.
Main Office 51 E Bethpage Road
Plainview, NY 11803

By: Edward J Reinhart

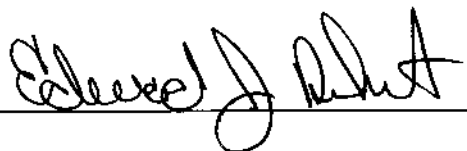
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- Claim of Trespass
- To be Served by a Process Server, to the below listed address, on or about September 9, 2015 to the following:

Virginia Grapenster
c/o Rosicki, Rosicki & Associates, P.C.
Main Office 51 E Bethpage Road
Plainview, NY 11803

By: 

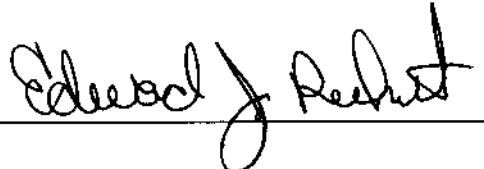
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- Claim of Trespass
- To be Served by a Process Server, to the below listed address, on or about September 9, 2015 to the following:

Laura Strauss
c/o Rosicki, Rosicki & Associates, P.C.
Main Office 51 E Bethpage Road
Plainview, NY 11803

By: 

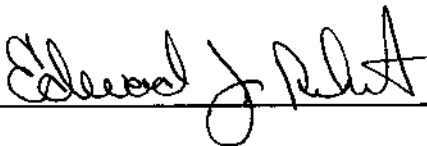
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- Claim of Trespass
- To be Served by a Process Server, to the below listed address, on or about September 9, 2015 to the following:

Mortgage Electronic Registration Systems, Inc.
1818 Library Street
Suite 300
Reston, VA 20190

By: 
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